Objection to Planning Application 24/00539/F April 2024

I object to the above planning application for the following reasons:

Context (to my objection):

The Triangle site was acquired by the Local Authority in the 1930's to 'protect the city from urban sprawl'. It is Green Belt land and under NPPF guidelines such development is not allowed unless there are 'very special circumstances' (VSC).

I would respectably argue that common sense dictates that this proposed 16,000 capacity stadium development with an 180-bed hotel and parking spaces is not a VSC and is simply an 'inappropriate development' - even the applicant OUFC has acknowledged that is it an inappropriate development and that it will cause harm to the environment.

OUFC say they need to find a new home by 2026. Facts have emerged that prove the club made itself homeless and hasn't tried to negotiate to stay at the Kassam Stadium (because it doesn't want to) - hence **they cannot claim this as a VSC.**

Information now in the public domain clearly shows as a fact that the owner of the Kassam stadium has said it is possible for OUFC to stay at the Kassam Stadium.

The Kassam stadium is quite young in terms of building life expectancy. It is madness to be spending over £100 million on constructing a new stadium which is away from the main supporter base and where **key trunk roads providing access to 'The Triangle'** land are already at maximum capacity.

The existing Kassam stadium has capacity for a fourth end to be built which would allow for increased the capacity and at a much reduced cost and with much less environmental damage.

The **most environmentally friendly solution** is for OUFC to stay at the Kassam Stadium, particularly with the new passenger Cowley Branch Line in the pipeline. Given OUFC need to raise over £100 million to build the new stadium it makes much more sense to offer to buy the Kassam stadium and enhance match day access and experiences from Cowley where road and rail links are better placed to cope with increased spectator numbers.

Objection specifics - material considerations:

1. Proposed road closures/traffic congestion/parking/pollution/highway & pedestrian safety:

There is a total lack of transparency and reality over traffic and pedestrian 'hope' modelling. It is also difficult to comment fully and properly when apparently OUFC have used the wrong traffic modelling method (a new report has apparently been commissioned).

OUFC have **proposed road closures** (Oxford Road) against express reservations of Thames Valley Police and the local Parish Council. What an earth are local residents and emergency services going to do to access key exit routes and amenities during these proposed periods of so-called 'diversions'? The Road network will grind to a halt. The local trunk roads are already invariably gridlocked at the best of times. **The proposed location for this stadium is** quite simply **unsuitable** to be able to cope with a large commercial hotel-cum-stadium development.

When the decision to lease (in principle) this precious Green Belt land to OUFC in September 2023, **Oxfordshire County Council was very clear that** there were **conditions** that must be fulfilled. One was planning permission and another, quite reasonably, was that **the Oxford Road must not be disrupted**.

There is no planning for scenarios such as if the WaterEaton Park & Ride is at capacity.

There will be wide spread traffic jams and gridlock with associated widespread parking issues affecting local Resident Parking Schemes and adding to air and noise pollution.

All of the above will impact road and pedestrian safety.

2. Green Belt land/environment & nature protection/air pollution/noise/light interference to wildlife:

The proposal is not a 'special case'. If there was a special case it would be for using this land to build more affordable housing but there are already huge numbers of houses going to be built along the Oxford Road with the loss of the historic open recreational land currently used by The North Oxford Golf Club.

Removing the 'triangle land', which was purchased to protect and stop urban sprawl, will result in the **loss of key green belt land** strategically purchased to **prevent towns and cities merging into one another.**

The land is currently providing a sustainable willow coppicing business and is proven to be biodiverse with wildlife habitat linking across to the adjacent Stratfield Brake Woodland. Reports confirm the triangle land is in fact **Ancient Woodland** and as such requires more protection than is currently planned, including an appropriate buffer zone.

The stadium proposal will have a massive impact on trees and wildlife. The woodland is notable for the amount of standing dying trees, deadwood, dead stumps and rotting coppice stools which create an extensive and valuable habitat for fungi and saproxylic (deadwood-breeding) insects. The woodland's valuable habitat **is not sufficiently recognised** by the Aboricultural Report. It is important that no deadwood is removed. Bats, including rare species such as *Barbastelle*, use the site, particularly the southern area by the woodland. This woodland contains many bat roosting opportunities.

An independent ecologist's report by Dr Judith Webb records 161 invertebrate species including 42 beetles, 17 butterflies, 7moths,1 lacewing, 4 dragonflies & damselflies, 20 true bugs, 17 bees & ants & wasps, 1 sawfly, 6 grasshoppers & crickets, 30 true flies, 2 molluscs, 14 spiders & harvestmen. Dr Webb also states this is just a small range and

nothing like the full species diversity of invertebrates that will be present. Increased traffic will lead to **increased air pollution** in the area.

3. Drainage/flood risk impact:

The site is susceptible to significant surface water flooding.

In recent wet weather (end of 2023/early 2024) the site has acted as a holding area for vast quantities of water, and has absorbed run-off from the Oxford Road during heavy rain.

The stadium development will mean that run-off from the Oxford Road has to go elsewhere and this could result in the road and other local flooding. What will the **cumulative effect of the developments in the area have on flooding?** This is already becoming more important as climate change progresses.

4. Design, appearance and materials/landscape impact:

The Design and Review Panel report says: "...there is a general feeling that everything is ever so slightly squeezed and that there is no spare land." (Note: Para 138 of the National Planning Policy Framework says "local planning authorities should have regard to the outcome from these processes, including any recommendations made by design review panels")

This is clearly **overdevelopment** in an **attempt to fit too much onto a constrained Green Belt site**. At nearly 25m high the stadium will dominate the landscape and will be obtrusive in what will eventually be a largely residential area on the outskirts of Kidlington

It would transform an area that is currently not really apparent and be an overbearing feature. It would also **urbanise the last remaining Green Belt gap** between Kidlington and Oxford and impact the setting of the Stratfield Brake Nature Reserve. It is clear from the 'LVIVA' extracts that there will be permanent and significant adverse effects on the surrounding landscape.

5. The Cherwell Local Plan

The stadium **is not included in the Local Plan.** The site was **left as Green Belt.** The Planning Inspector noted that, on this basis, "....the overall sense of separation between Kidlington and Oxford in particular, would not be harmfully reduced." Development of the site will remove the last remaining separation of Kidlington from Oxford.

6. Other key issues:

• Entry, Exit and Evacuation and Major Incidents/Disaster: the site is bounded by busy roads and is **too small for the level of proposed development** (reference the Design & Review Panel statement: "...there is a general feeling that everything is ever so slightly squeezed and that there is no spare land")

- The site is constrained by features such as the car park, woodland and attenuation ponds and there are few access points into the site and there is a difference in level from the highway to the stadium.
- In the event of an emergency it is impossible to see how the stadium could be safely
 evacuated within 8 minutes. Similarly it is impossible to see where people could
 muster safely.
- The planning application lists laws and regulations but **fails to address key safety** issues
- In general there is a **lack of safety** both for spectators, for users of the adjacent roads, and members of the public who are not involved in the football.
- There is also **insufficient room to allow for segregation** of home and away fans.
- The Design & Review Panel (which the local authority should have regard to) commented:

"There is a concern that the proposed main entrance area point to the stadium **may not** be able to safely accommodate the sheer volume of fans. It is felt there may not be enough arrival space to accommodate the supporters before they disperse to their seats. A lack of space in this area could also give rise to problems of supporter segregation. The practical problems of access are also accentuated by the difference in levels from the highway".

- This is clearly a safety issue.
- The safety issues around access to and egress from the proposed stadium site are not addressed in the documents supporting the application other than by a request for the planning consent to be conditioned.
- Oxford Parkway Rail Station Safety this station is small and unsuitable for crowds of fans, mixing both home and away, and arriving en masse. The platforms are narrow as is the footbridge across the track. Fans and other users will be at risk.
- Energy Efficiency the application says: "The stadium will be constructed to achieve the highest economically viable energy efficiency....." this pledge is made meaningless by the phrase: 'achieve the highest economically viable energy efficiency'!
- Economic benefits: The area around the proposed site does not need additional employment opportunities of the type likely to be offered by this development. Local businesses have closed in Kidlington due to lack of staffing.
- Chapter 15 of the Environmental Statement shows that most of the socio-economic
 effects are of negligible or minor significance to the area, the remainder are moderate,
 and none are high. And the effect of regular road closures and overloaded Park &
 Rides is likely to outweigh any possible benefits in any event!

Concluding comments: why I object to this application:

There are **huge flaws** with this proposal. There are **many material planning implications** that should be major concerns for Cherwell District Council and its associated co-local authorities and which render this application to be **fully rejected.**

This proposed development will adversely affect residents and local wildlife and habitats as well as cause massive traffic jams and gridlock with widespread parking issues leading to note potential public safety issues. It is simply not the right location for such a large development.

Having this stadium ready by 2026 is **unrealistic** and has been proven to be **unwarranted** knowing that the Oxford United Football Club is potentially **able to remain at their current site** (and indeed could negotiate to acquire the site) where existing and proposed infrastructure will be more readily able to adapt to the *hope* of increased fan numbers and support. Common sense dictates the best course of action for OUFC is to seek to stay at The Kassam site.

Regular road closures will cause traffic chaos.

A commercial development of this size and scale is contrary to the Local Plan and planning policy for Green Belt sites.

It will destroy valuable biodiverse wildlife habitat.

The Triangle land is the last piece of Green Belt land between Kidlington and Oxford and the planning committee should not agree to allow this land to be developed.